

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF RHODE ISLAND**

DAN DIAMANT, Plaintiff

vs.

CA No. 17- cv548 JJM-PAS

**UTGR, Inc. dba Twin River Casino,
Et al.**

PLAINTIFF’S PROPOSED VOIR DIRE

Now comes the Plaintiff, by and through counsel, and proposes the following questions for empanelment:

1. Have you ever visited a casino? If so, where? How many times? Have you ever visited Twin River?
2. What games do you like to play? Do you play blackjack? Have you ever played blackjack?
3. Are you familiar with the term “card counting?” What do you understand it to mean?
4. You are going to hear during the course of this trial that card counting—keeping track in your head of cards that have been played in order to help determine the odds of which

cards are coming next—is not a crime. It is not cheating. It is legal, even though you will hear that casinos don't like card counters. What do you think about this fact?

5. Have you or a close family member ever worked in law enforcement?
6. Do you believe that people who work in law enforcement are more trustworthy or believable than other people? In other words, would you trust the word of a police officer more than other individuals?
7. Please tell us where you get your news. Do you get a daily newspaper? Website? Television?
8. Do you use social media? Which ones?
9. Have you ever traveled overseas? Where? Have you ever visited Israel? Ever met someone from Israel?
10. What do you think about the conflict between Palestinians and the State of Israel?

/S/ Thomas G. Briody
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CERTIFICATION

The undersigned certifies that a true copy of these proposed voir dire questions were served via electronic mail and via ECF Paul R. Crowell, Engleberg and Bratcher, 100 High Street, Boston, MA 02110, Brenda Baum, Rhode Island Department of Attorney General, 150 S. Main Street, Providence, RI 02903, and Marc DeSisto, 60 Ship Street, Providence, RI 02903 on 20th of November, 2020.

/s/ Thomas G. Briody